

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

KATHERINE CALLAHAN)
vs.)
Plaintiff,) Cause No.
vs.)
) Division
ROBERTO RODRIGUEZ)
Serve at:)
7656 N. Brooklyn Ave.)
Gladstone, MO 64118)
AND,)
LOAD EXPRESS, LLC)
Serve Registered Agent at:)
Karanti Pal Singh, Registered Agent)
7336 Bell Road, Lenexa, KS 66219)
Defendants.) JURY TRIAL DEMANDED

PETITION

COMES NOW Plaintiff, Katherine Callahan., by and through her attorneys, Brown & Crouppen, P.C., and for her claims against Defendants, Roberto Rodriguez and Load Express, LLC, states:

1. Plaintiff is, and was at all times material hereto, a resident of St. Charles County, State of Missouri.
2. Defendant Roberto Rodriguez (hereinafter “Defendant Rodriguez”) is, and was at all times material hereto, a resident of Clay County, State of Missouri.
3. Defendant Load Express, LLC (hereinafter “Defendant Load Express”) is a corporation with a principal place of business in the State of Kansas that conducts business in the State of Missouri as an interstate motor carrier subject to Federal Motor Carrier Safety

Regulations promulgated by the Federal Motor Carrier Safety Administration, U.S. Department of Transportation.

4. At all times material hereto, Interstate 70, at or near U.S Route 67 was, and remains, an open and public street and highway in St. Louis County, State of Missouri.

5. Venue of this action properly lies in this judicial circuit because the cause of action accrued in the St. Louis County, State of Missouri.

6. On or about June 13, 2020, Plaintiff was operating a vehicle westbound in Interstate 70 at or near U.S. Route 67 in St. Louis County, State of Missouri.

7. On or about June 13, 2020, Defendant Rodriguez was operating commercial vehicle – USDOT #1453177 – westbound on Interstate 70 at or near U.S. Route 67 in St. Louis County, State of Missouri.

8. On or about June 13, 2020 and at all times material hereto, Defendant Rodriguez was acting as the agent, servant, or employee of Defendant Load Express.

9. On or about June 13, 2020, and at all times material hereto, Defendant Load Express owned the commercial vehicle – USDOT #1453177 – and at all times material hereto exercised control over the vehicle being driven by its agent, servant and/or employee, Defendant Rodriguez.

10. On or about June 13, 2020, while operating Defendant Load Express's commercial vehicle – USDOT #1453177 – westbound on Interstate 70, Defendant Rodriguez while in the scope of his employment with Defendant Load Express and as Defendant Load Express's agent, servant, and / or employee, collided with the vehicle being operated by the Plaintiff.

COUNT I

Defendant – Roberto Rodriguez

Comes now Plaintiff, and for her cause of action against Defendant Rodriguez, and states as follows:

11. Plaintiff adopts by reference each and every paragraph and sub-paragraph contained in paragraphs 1-10 above.

12. On or about June 13, 2020, Defendant Rodriguez was operating commercial vehicle – USDOT #1453177 – westbound on Interstate 70 at or near U.S. Route 67 in St. Louis County, State of Missouri when he caused and permitted the commercial vehicle to come into the Plaintiff's lane of travel and strike the Plaintiff's vehicle, including side swiping the driver's side of the Plaintiff's vehicle and directly and proximately causing injuries to the Plaintiff which were the direct and proximate result of the carelessness and negligence of Defendant Rodriguez.

13. Defendant Rodriguez caused the collision with the Plaintiff's vehicle as a direct result of his negligence in one or more of the following respects:

- a) Defendant Rodriguez was inattentive to the roadway;
- b) Defendant Rodriguez failed to yield the right-of-way;
- c) Defendant Rodriguez improperly changed lanes;
- d) Defendant Rodriguez improperly merged;
- e) Defendant Rodriguez failed to keep the commercial vehicle within the lane;
- f) Defendant Rodriguez failed to sound a warning of his approach, to slacken speed, swerve or stop before colliding with Plaintiff's vehicle;
- g) Defendant Rodriguez failed to maintain control the commercial vehicle;
- h) Defendant Rodriguez operated the commercial vehicle at an excessive rate of speed under the circumstances then and there existing;

i) Defendant Rodriguez failed to exercise the highest degree of care to keep a lookout to the front and laterally so as to discover Plaintiff's vehicle.

14. Defendant Rodriguez owed a duty of care to members of the general public, including Plaintiff, while using the public roadways on or about June 13, 2020.

15. As a direct and proximate result of the negligence and carelessness of Defendant Rodriguez, as aforesaid, Plaintiff was caused to suffer and did suffer from serious and permanent injuries in the following respects, to-wit: Plaintiff suffered injuries to her back, neck, knees, head, abdomen, chest, and shoulders - all of which are and will continue to be limiting, permanent, progressive, painful; Plaintiff's injuries and symptoms will continue to impair and diminish the function and movement of aforementioned body parts; Plaintiff suffered, does suffer and will in the future continue to suffer pain; Plaintiff further suffered emotional distress and loss of enjoyment of life and will continue to suffer same in the future.

16. That as a direct and proximate result of the negligence and carelessness of Defendant Rodriguez, Plaintiff underwent treatment and incurred medical expenses exceeding \$40,000.00.

17. That as a direct and proximate result of the negligence and carelessness of Defendant Rodriguez, Plaintiff is reasonably likely to require additional treatment and incur additional medical expenses in the future.

18. That as a direct and proximate result of the negligence and carelessness of Defendant Rodriguez, Plaintiff sustained lost wages and earnings.

19. That as a direct and proximate result of the negligence and carelessness of Defendant Rodriguez, Plaintiff is likely to sustain additional lost wages and earnings in the future.

20. That as a direct and proximate result of the negligence and carelessness of Defendant Rodriguez, Plaintiff sustained damages in excess of \$25,000.00.

WHEREFORE, Plaintiff prays for judgment against Defendant Rodriguez in an amount that is fair and reasonable, in excess of \$25,000.00, plus costs incurred and for such other and further relief as the Court deems just and proper.

COUNT II

Defendant – Load Express, LLC.

21. Plaintiff adopts by reference each and every paragraph and sub-paragraph contained in paragraphs 1-20 above.

22. On or about June 13, 2020, Defendant Load Express's driver, agent, servant and/or employee (Defendant Rodriguez), while acting within the scope of his employment and/or agency, was operating commercial vehicle – USDOT #1453177 – westbound on Interstate 70 at or near U.S. Route 67 in St. Louis County, State of Missouri when he caused and permitted the commercial vehicle to come into the Plaintiff's lane of travel and strike the Plaintiff's vehicle, including side swiping the driver's side of the Plaintiff's vehicle and directly and proximately causing injuries to the Plaintiff which were the direct and proximate result of Defendant Load Express's driver's carelessness and negligence and; therefore, of Defendant Load Express.

23. Defendant Load Express's driver, agent, servant and/or employee (Defendant Rodriguez) caused the collision with the Plaintiff's vehicle as a direct result of his negligence in one or more of the following respects:

- a) Its driver was inattentive to the roadway;
- b) Its driver failed to yield the right-of-way;
- c) Its driver improperly changed lanes;

- d) Its driver improperly merged;
- e) Its driver failed to keep the commercial vehicle within the lane;
- f) Its driver failed to sound a warning of his approach, to slacken speed, swerve or stop before colliding with Plaintiff's vehicle;
- g) Its driver failed to maintain control the commercial vehicle;
- h) Its driver operated the commercial vehicle at an excessive rate of speed under the circumstances then and there existing;
- i) Its driver failed to exercise the highest degree of care to keep a lookout to the front and laterally so as to discover Plaintiff's vehicle.

24. Its driver owed a duty of care to members of the general public, including Plaintiff, while using the public roadways on or about June 13, 2020.

25. As a direct and proximate result of the negligence and carelessness of Defendant Load Express's driver, agent, servant and/or employee (Defendant Rodriguez), as aforesaid, Plaintiff was caused to suffer and did suffer from serious and permanent injuries in the following respects, to-wit: Plaintiff suffered injuries to her back, neck, knees, head, abdomen, chest, and shoulders - all of which are and will continue to be limiting, permanent, progressive, painful; Plaintiff's injuries and symptoms will continue to impair and diminish the function and movement of aforementioned body parts; Plaintiff suffered, does suffer and will in the future continue to suffer pain; Plaintiff further suffered emotional distress and loss of enjoyment of life and will continue to suffer same in the future.

26. That as a direct and proximate result of the negligence and carelessness of Defendant Load Express's driver, agent, servant and/or employee (Defendant Rodriguez), Plaintiff underwent treatment and incurred medical expenses exceeding \$40,000.00.

27. That as a direct and proximate result of the negligence and carelessness of Defendant Load Express's driver, agent, servant and/or employee (Defendant Rodriguez),

Plaintiff is reasonably likely to require additional treatment and incur additional medical expenses in the future.

28. That as a direct and proximate result of the negligence and carelessness of Defendant Load Express's driver, agent, servant and/or employee (Defendant Rodriguez), Plaintiff sustained lost wages and earnings.

29. That as a direct and proximate result of the negligence and carelessness of Defendant Load Express's driver, agent, servant and/or employee (Defendant Rodriguez), Plaintiff is likely to sustain additional lost wages and earnings in the future.

30. That as a direct and proximate result of the negligence and carelessness of Defendant Load Express's driver, agent, servant and/or employee (Defendant Rodriguez), Plaintiff sustained damages in excess of \$25,000.00.

WHEREFORE, Plaintiff prays for judgment against Defendant Load Express in an amount that is fair and reasonable, in excess of \$25,000.00, plus costs incurred and for such other and further relief as the Court deems just and proper.

RESPECTFULLY SUBMITTED:

BROWN & CROUPPEN, P.C.

BY: /s/ Brad Elkin
Brad Elkin #54760
Aaron Clite #72749
Attorney for Plaintiff
One Metropolitan Square
211 N. Broadway, Suite 1600
St. Louis, Missouri 63102
(314) 421-0216
(314) 421-0359 (Fax)
brade@getbc.com
AaronC@getbc.com
pipeline@getbc.com

In the
CIRCUIT COURT
Of St. Louis County, Missouri



For File Stamp Only

Katherine Callahan
 Plaintiff/Petitioner

Date _____

vs.

Roberto Rodriguez and Load Express, Inc.
 Defendant/Respondent

Case Number _____

Division _____

L

J

REQUEST FOR APPOINTMENT OF PROCESS SERVER

Comes now Katherine Callahan, pursuant

Requesting Party

to Local Rule 28, and at his/her/its own risk requests the appointment of the Circuit Clerk of

<u>John Frederick, Cody Terry, Isaiah Thomas</u> Name of Process Server	<u>PO Box St. Louis, MO 63127</u> Address	<u>314-966-5585</u> Telephone
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<u>Luke Prewitt, Dave Roberts, Rebecca Watters</u> Name of Process Server	<u>"</u> Address or in the Alternative	<u>"</u> Telephone
--	---	-----------------------

<u>Jessica Frederick</u> Name of Process Server	<u>"</u> Address or in the Alternative	<u>"</u> Telephone
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Natural person(s) of lawful age to serve the summons and petition in this cause on the below named parties. This appointment as special process server does not include the authorization to carry a concealed weapon in the performance thereof.

SERVE:

<u>Roberto Rodriguez</u> Name	<u>7656 N. Brooklyn Ave.</u> Address	<u>Gladstone, MO 64118</u> City/State/Zip
----------------------------------	---	--

SERVE:

<u>Load Express, Inc. Reg. Agent: Karanti Pal Singh</u> Name	<u>7336 Bell Road</u> Address	<u>Lenexa KS 66219</u> City/State/Zip
---	----------------------------------	--

SERVE:

Name	Address
Address	City/State/Zip

SERVE:

Name	Address
Address	City/State/Zip

Appointed as requested:

JOAN M. GILMER, Circuit Clerk

By /s/Jeremy Smith
 Deputy Clerk

3/14/2022

Date

/s/ Brad L. Elkin

Signature of Attorney/Plaintiff/Petitioner

54760

Bar No.

211 N. Broadway, Ste. 1600, St. Louis MO 63102

Address

(314) 222-2222

(314) 421-0359

Fax No.

Local Rule 28. SPECIAL PROCESS SERVERS

(1) Any Judge may appoint a Special Process Server in writing in accordance with the law and at the risk and expense of the requesting party except no special process server shall be appointed to serve a garnishment [except as allowed by Missouri Supreme Court Rule 90.03(a)].

This appointment as Special Process Server does not include the authorization to carry a concealed weapon in the performance thereof.

(2) The Circuit Clerk may appoint a natural person other than the Sheriff to serve process in any cause in accordance with this subsection;

(A) Appointments may list more than one server as alternates.

(B) The appointment of a person other than the Sheriff to serve process shall be made at the risk and expense of the requesting party.

(C) Any person of lawful age, other than the Sheriff, appointed to serve process shall be a natural person and not a corporation or other business association.

(D) No person, other than the Sheriff, shall be appointed to serve any order, writ or other process which requires any levy, seizure, sequestration, garnishment, [except as allowed by Missouri Supreme Court Rule 90.03(a)], or other taking.

(E) Requests for appointment of a person other than the Sheriff to serve process shall be made on a "Request for Appointment of Process Server" electronic form, which may be found on the Court's Web Site, <http://www.stlouisco.com>. (LawandPublicSafety/Circuit/Forms).

(F) This appointment as Special Process Server does not include the authorization to carry a concealed weapon in the performance thereof.

SERVICE RETURN

Any service by the St. Louis County Sheriff's Office shall be scanned into the courts case management system. Any service by another Sheriff or a Special Process Server or any other person authorized to serve process shall return to the attorney or party who sought service and the attorney shall file the return electronically to the Circuit Clerk.

In the
CIRCUIT COURT
Of St. Louis County, Missouri



For File Stamp Only

Katherine Callahan
 Plaintiff/Petitioner

Date

22SL-CC01611

Case Number

vs.

Roberto Rodriguez and Load Express, Inc.
 Defendant/Respondent

Division

L

AMENDED
REQUEST FOR APPOINTMENT OF PROCESS SERVER

Comes now Katherine Callahan, pursuant

Requesting Party

to Local Rule 28, and at his/her/its own risk requests the appointment of the Circuit Clerk of

<u>Andrew Wieklosse, Dana Fortner, Kim Presler</u>	<u>PO Box St. Louis, MO 63127</u>	<u>314-966-5585</u>
Name of Process Server	Address	Telephone

<u>Heather Merfen, Alisha Allen, Andrew Wieklosse</u>	"	"
Name of Process Server	Address or in the Alternative	Telephone

<u>"</u>	<u>"</u>	<u>"</u>
Name of Process Server	Address or in the Alternative	Telephone

Natural person(s) of lawful age to serve the summons and petition in this cause on the below named parties. This appointment as special process server does not include the authorization to carry a concealed weapon in the performance thereof.

SERVE:

Roberto Rodriguez
 Name
7656 N. Brooklyn Ave.
 Address
Gladstone, MO 64118
 City/State/Zip

SERVE:

Load Express, Inc. Reg. Agent: Karanti Pal Singh
 Name
7336 Bell Road
 Address
Lenexa KS 66219
 City/State/Zip

SERVE:

Name
 Address
 City/State/Zip

SERVE:

Name
 Address
 City/State/Zip

Appointed as requested:

JOAN M. GILMER, Circuit Clerk

By _____
 Deputy Clerk

Date

/s/ Brad L. Elkin

Signature of Attorney/Plaintiff/Petitioner

54760

Bar No.

211 N. Broadway, Ste. 1600, St. Louis MO 63102

Address

(314) 222-2222 (314) 421-0359

Phone No. Fax No.

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IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: <u>JOSEPH L. WALSH III</u>	Case Number: 22SL-CC01611
Plaintiff/Petitioner: <u>KATHERINE CALLAHAN</u>	Plaintiff's/Petitioner's Attorney/Address BRADLEY LAWRENCE ELKIN BROWN AND CROUPPEN P.C. 211 NORTH BROADWAY SUITE 1600 ST LOUIS, MO 63102
vs. Defendant/Respondent: <u>ROBERTO RODRIGUEZ</u>	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: <u>CC Pers Injury-Vehicular</u>	
	(Date File Stamp)

Summons in Civil Case**The State of Missouri to:** LOAD EXPRESS, LLC.

Alias:

KARANTI PAL SINGH
7336 BELL ROAD
LENEXA, KS 66219

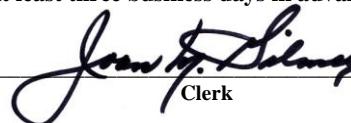
**ST. LOUIS COUNTY**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739, email at SLCADA@courts.mo.gov, or through Relay Missouri by dialing 711 or 800-735-2966, at least three business days in advance of the court proceeding.

14-MAR-2022
 Date

Further Information:
 JS



Clerk

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with

_____ a person at least 18 years of age residing therein.

(for service on a corporation) delivering a copy of the summons and a copy of the petition to

_____ (name) _____ (title).

other _____.

Served at _____ (address)

in _____ (County/City of St. Louis, MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary

Supplemental Surcharge \$ _____ 10.00

Mileage \$ _____ (_____ miles @ \$. _____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

Twenty First Judicial Circuit

NOTICE OF ALTERNATIVE DISPUTE RESOLUTION SERVICES

Purpose of Notice

As a party to a lawsuit in this court, you have the right to have a judge or jury decide your case. However, most lawsuits are settled by the parties before a trial takes place. This is often true even when the parties initially believe that settlement is not possible. A settlement reduces the expense and inconvenience of litigation. It also eliminates any uncertainty about the results of a trial.

Alternative dispute resolution services and procedures are available that may help the parties settle their lawsuit faster and at less cost. Often such services are most effective in reducing costs if used early in the course of a lawsuit. Your attorney can aid you in deciding whether and when such services would be helpful in your case.

Your Rights and Obligations in Court Are Not Affected By This Notice

You may decide to use an alternative dispute resolution procedure if the other parties to your case agree to do so. In some circumstances, a judge of this court may refer your case to an alternative dispute resolution procedure described below. These procedures are not a substitute for the services of a lawyer and consultation with a lawyer is recommended. Because you are a party to a lawsuit, you have obligations and deadlines which must be followed whether you use an alternative dispute resolution procedure or not. **IF YOU HAVE BEEN SERVED WITH A PETITION, YOU MUST FILE A RESPONSE ON TIME TO AVOID THE RISK OF DEFAULT JUDGMENT, WHETHER OR NOT YOU CHOOSE TO PURSUE AN ALTERNATIVE DISPUTE RESOLUTION PROCEDURE.**

Alternative Dispute Resolution Procedures

There are several procedures designed to help parties settle lawsuits. Most of these procedures involve the services of a neutral third party, often referred to as the "neutral," who is trained in dispute resolution and is not partial to any party. The services are provided by individuals and organizations who may charge a fee for this help. Some of the recognized alternative dispute resolutions procedures are:

(1) Advisory Arbitration: A procedure in which a neutral person or persons (typically one person or a panel of three persons) hears both sides and decides the case. The arbitrator's decision is not binding and simply serves to guide the parties in trying to settle their lawsuit. An arbitration is typically less formal than a trial, is usually shorter, and may be conducted in a private setting at a time mutually agreeable to the parties. The parties, by agreement, may select the arbitrator(s) and determine the rules under which the arbitration will be conducted.

(2) Mediation: A process in which a neutral third party facilitates communication between the parties to promote settlement. An effective mediator may offer solutions that have not been considered by the parties or their lawyers. A mediator may not impose his or her own judgment on the issues for that of the parties.

(3) Early Neutral Evaluation (“ENE”): A process designed to bring the parties to the litigation and their counsel together in the early pretrial period to present case summaries before and receive a non-binding assessment from an experienced neutral evaluator. The objective is to promote early and meaningful communication concerning disputes, enabling parties to plan their cases effectively and assess realistically the relative strengths and weaknesses of their positions. While this confidential environment provides an opportunity to negotiate a resolution, immediate settlement is not the primary purpose of this process.

(4) Mini-Trial: A process in which each party and their counsel present their case before a selected representative for each party and a neutral third party, to define the issues and develop a basis for realistic settlement negotiations. The neutral third party may issue an advisory opinion regarding the merits of the case. The advisory opinion is not binding.

(5) Summary Jury Trial: A summary jury trial is a non binding, informal settlement process in which jurors hear abbreviated case presentations. A judge or neutral presides over the hearing, but there are no witnesses and the rules of evidence are relaxed. After the “trial”, the jurors retire to deliberate and then deliver an advisory verdict. The verdict then becomes the starting point for settlement negotiations among the parties.

Selecting an Alternative Dispute Resolution Procedure and a Neutral

If the parties agree to use an alternative dispute resolution procedure, they must decide what type of procedure to use and the identity of the neutral. As a public service, the St. Louis County Circuit Clerk maintains a list of persons who are available to serve as neutrals. The list contains the names of individuals who have met qualifications established by the Missouri Supreme Court and have asked to be on the list. The Circuit Clerk also has Neutral Qualifications Forms on file. These forms have been submitted by the neutrals on the list and provide information on their background and expertise. They also indicate the types of alternative dispute resolution services each neutral provides.

A copy of the list may be obtained by request in person and in writing to: Circuit Clerk, Office of Dispute Resolution Services, 105 South Central Ave., 5th Floor, Clayton, Missouri 63105. The Neutral Qualifications Forms will also be made available for inspection upon request to the Circuit Clerk.

The List and Neutral Qualification Forms are provided only as a convenience to the parties in selecting a neutral. The court cannot advise you on legal matters and can only provide you with the List and Forms. You should ask your lawyer for further information.

CCADM73



IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: <u>JOSEPH L. WALSH III</u>	Case Number: 22SL-CC01611
Plaintiff/Petitioner: KATHERINE CALLAHAN	Plaintiff's/Petitioner's Attorney/Address BRADLEY LAWRENCE ELKIN BROWN AND CROUPPEN P.C. 211 NORTH BROADWAY SUITE 1600 ST LOUIS, MO 63102
vs. Defendant/Respondent: ROBERTO RODRIGUEZ	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Pers Injury-Vehicular	
	(Date File Stamp)

Summons in Civil Case**The State of Missouri to: ROBERTO RODRIGUEZ**

Alias:

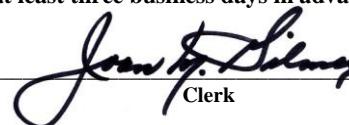
**7656 N. BROOKLYN AVE.
GLADSTONE, MO 64118****ST. LOUIS COUNTY**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

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14-MAR-2022
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I certify that I have served the above summons by: (check one)

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 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with

_____ a person at least 18 years of age residing therein.

(for service on a corporation) delivering a copy of the summons and a copy of the petition to

_____ (name) _____ (title).

other _____.

Served at _____ (address)

in _____ (County/City of St. Louis, MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary

Supplemental Surcharge \$ _____ 10.00

Mileage \$ _____ (_____ miles @ \$. _____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

Twenty First Judicial Circuit

NOTICE OF ALTERNATIVE DISPUTE RESOLUTION SERVICES

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Alternative dispute resolution services and procedures are available that may help the parties settle their lawsuit faster and at less cost. Often such services are most effective in reducing costs if used early in the course of a lawsuit. Your attorney can aid you in deciding whether and when such services would be helpful in your case.

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You may decide to use an alternative dispute resolution procedure if the other parties to your case agree to do so. In some circumstances, a judge of this court may refer your case to an alternative dispute resolution procedure described below. These procedures are not a substitute for the services of a lawyer and consultation with a lawyer is recommended. Because you are a party to a lawsuit, you have obligations and deadlines which must be followed whether you use an alternative dispute resolution procedure or not. **IF YOU HAVE BEEN SERVED WITH A PETITION, YOU MUST FILE A RESPONSE ON TIME TO AVOID THE RISK OF DEFAULT JUDGMENT, WHETHER OR NOT YOU CHOOSE TO PURSUE AN ALTERNATIVE DISPUTE RESOLUTION PROCEDURE.**

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(2) Mediation: A process in which a neutral third party facilitates communication between the parties to promote settlement. An effective mediator may offer solutions that have not been considered by the parties or their lawyers. A mediator may not impose his or her own judgment on the issues for that of the parties.

(3) Early Neutral Evaluation (“ENE”): A process designed to bring the parties to the litigation and their counsel together in the early pretrial period to present case summaries before and receive a non-binding assessment from an experienced neutral evaluator. The objective is to promote early and meaningful communication concerning disputes, enabling parties to plan their cases effectively and assess realistically the relative strengths and weaknesses of their positions. While this confidential environment provides an opportunity to negotiate a resolution, immediate settlement is not the primary purpose of this process.

(4) Mini-Trial: A process in which each party and their counsel present their case before a selected representative for each party and a neutral third party, to define the issues and develop a basis for realistic settlement negotiations. The neutral third party may issue an advisory opinion regarding the merits of the case. The advisory opinion is not binding.

(5) Summary Jury Trial: A summary jury trial is a non binding, informal settlement process in which jurors hear abbreviated case presentations. A judge or neutral presides over the hearing, but there are no witnesses and the rules of evidence are relaxed. After the “trial”, the jurors retire to deliberate and then deliver an advisory verdict. The verdict then becomes the starting point for settlement negotiations among the parties.

Selecting an Alternative Dispute Resolution Procedure and a Neutral

If the parties agree to use an alternative dispute resolution procedure, they must decide what type of procedure to use and the identity of the neutral. As a public service, the St. Louis County Circuit Clerk maintains a list of persons who are available to serve as neutrals. The list contains the names of individuals who have met qualifications established by the Missouri Supreme Court and have asked to be on the list. The Circuit Clerk also has Neutral Qualifications Forms on file. These forms have been submitted by the neutrals on the list and provide information on their background and expertise. They also indicate the types of alternative dispute resolution services each neutral provides.

A copy of the list may be obtained by request in person and in writing to: Circuit Clerk, Office of Dispute Resolution Services, 105 South Central Ave., 5th Floor, Clayton, Missouri 63105. The Neutral Qualifications Forms will also be made available for inspection upon request to the Circuit Clerk.

The List and Neutral Qualification Forms are provided only as a convenience to the parties in selecting a neutral. The court cannot advise you on legal matters and can only provide you with the List and Forms. You should ask your lawyer for further information.

CCADM73

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

KATHERINE CALLAHAN)
vs.)
Plaintiff,) Cause No. 22SL-CC01611
vs.)
))
ROBERTO RODRIGUEZ)
AND,)
LOAD EXPRESS, LLC.)
Defendants.)

MEMORANDUM TO COURT CLERK

COMES NOW Plaintiff, and hereby files a copy of the return of service upon
Defendant Load Express, LLC., by serving Sany Khinda, an authorized, agent at for the
business on April 8, 2022.

BROWN & CROUPPEN, P.C.

BY: /s/ Brad L. Elkin
Brad L. Elkin, #54760
Aaron Clite, #72749
One Metropolitan Square
211 N. Broadway, Suite 1600
St. Louis, MO 63102
(314) 222-2222
(314) 421-0359 (Fax)
Brade@getbc.com
Aaronc@getbc.com
pipeline@getbc.com
Attorney for Plaintiff



IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: JOSEPH L. WALSH III	Case Number: 22SL-CC01611
Plaintiff/Petitioner: KATHERINE CALLAHAN	Plaintiff's/Petitioner's Attorney/Address BRADLEY LAWRENCE ELKIN BROWN AND CROUPPEN P.C. 211 NORTH BROADWAY SUITE 1600 ST LOUIS, MO 63102
vs. Defendant/Respondent: ROBERTO RODRIGUEZ	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Pers Injury-Vehicular	(Date File Stamp)

Summons in Civil Case

The State of Missouri to: **LOAD EXPRESS, LLC.**
Alias:

**KARANTI PAL SINGH
7336 BELL ROAD
LENEXA, KS 66219**



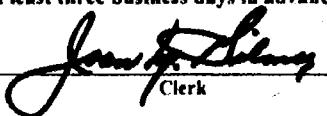
ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739, email at SLCADA@courts.mo.gov, or through Relay Missouri by dialing 711 or 800-735-2966, at least three business days in advance of the court proceeding.

14-MAR-2022
Date

Further Information:
JS


Clerk

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person at least 18 years of age residing therein.

(for service on a corporation) delivering a copy of the summons and a copy of the petition to

Sandy Khinda (name) Authorized Agent (title).

other Sandy stated that she was authorized to accept for Business.

Served at 7936 Bell RD, Lenexa KS 66219 (address)

in Johnson (County/City of St. Louis), MO, on 4-8-22 (date) at 6:17 PM (time).

Kim Presler

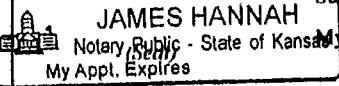
Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on 4-13-22

(date)



My commission expires: 8/23/23

Date

Notary Public

My Appl. Expires

(date)

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

KATHERINE CALLAHAN)
Plaintiff,)
vs.) Cause No. 22SL-CC01611
ROBERTO RODRIGUEZ)
AND,)
LOAD EXPRESS, LLC.)
Defendants.)

MEMORANDUM TO COURT CLERK

COMES NOW Plaintiff, and hereby files a copy of the return of service upon
Defendant Roberto Rodriguez, by serving Defendant's mother at his usual place of abode
on April 8, 2022.

BROWN & CROUPPEN, P.C.

BY: /s/ Brad L. Elkin
Brad L. Elkin, #54760
Aaron Clite, #72749
One Metropolitan Square
211 N. Broadway, Suite 1600
St. Louis, MO 63102
(314) 222-2222
(314) 421-0359 (Fax)
Brade@getbc.com
Aaronc@getbc.com
pipeline@getbc.com
Attorney for Plaintiff


IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: JOSEPH L. WALSH III	Case Number: 22SL-CC01611
Plaintiff/Petitioner: KATHERINE CALLAHAN	Plaintiff's/Petitioner's Attorney/Address BRADLEY LAWRENCE ELKIN BROWN AND CROPPEN P.C. 211 NORTH BROADWAY SUITE 1600 ST LOUIS, MO 63102
vs. Defendant/Respondent: ROBERTO RODRIGUEZ	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Pers Injury-Vehicular	(Date File Stamp)

Summons in Civil Case
The State of Missouri to: ROBERTO RODRIGUEZ

Alias:

**7656 N. BROOKLYN AVE.
GLADSTONE, MO 64118**

ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739, email at SL.CADA@courts.mo.gov, or through Relay Missouri by dialing 711 or 800-735-2966, at least three business days in advance of the court proceeding.

14-MAR-2022

Date

 Further Information:
JS


Clerk

Sheriff's or Server's Return
Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person at least 18 years of age residing therein.

 (for service on a corporation) delivering a copy of the summons and a copy of the petition to

Jane Doe (name) Mother (title).

other Subjects mother did not speak English. Spouse with Defendant via video chat (address)
 Served at 7656 N Brooklyn Ave Gladstone Mo. (County/City of St. Louis), MO on 4-8-22 (date) at 6:45 PM (time).

Alisha Allen

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(date).

JAMES HANNAH

 Notary Public - State of Kansas
 My Appl. Expires 8/23/23
Subscribed and sworn to before me on 4-15-22

Date

Notary Public